

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CHARLES THORNTON,]	
Plaintiff]	
]	C.A. NO. 05-10210-RGS
v.]	
]	
UNITED PARCEL SERVICE, INC.,]	
Defendant]	

PROPOSED VOIR DIRE BY UNITED PARCEL SERVICE, INC.

Pursuant to Fed.R.Civ.P. 47(a), the defendant, United Parcel Service, Inc. ("UPS") requests that the following questions be asked of each potential juror in addition to the standard questions concerning knowledge of the parties and witnesses:

1. What responsibilities do you believe an employee owes to an employer?
2. What responsibilities do you believe an employer owes to an employee?
3. Do you suffer from a disability?
 - a. If so, has that disability interfered with your work in any manner? If so, please explain.
 - b. If so, do you believe that you have ever been treated unfairly by an employer because of your disability? If so, please explain.
 - c. Have you ever requested from your employer any accommodation in order to perform your job functions? If so, please explain.
 - d. Did your employer provide you with the requested accommodation? If so, please explain.
 - e. Have you ever had work restrictions placed upon you because of your disability? If so, please explain.

f. Have you ever been placed on modified work because of your disability? If so, please explain.

4. Have you ever worked as a tractor trailer driver? Has anyone in your immediate family ever worked as a tractor trailer driver? If so, please explain.

5. Do you or anyone in your family work for a package delivery service that competes with UPS, such as Federal Express, DHL or others? If so, please explain.

6. Have you ever had particularly good or particularly bad experiences with UPS, either as customer or in any other way? If so, please explain.

7. Are you or anyone in your family a member of any group that advocates for disabled people? If so, please explain.

8. Do you have a commercial driver's license?

9. Are you a member of a labor union?

a. If so, which one?

10. Have you ever brought a formal claim of discrimination against an employer? If so, please explain.

CERTIFICATE OF SERVICE

I, Elizabeth A. Kowal, hereby certify that I have on this 4th day of February, 2008,
electronically filed Questions Proposed by United Parcel Service, Inc. with the Clerk of Court
using the CM/ECF system which will send notification of such filing to the following:

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/s/ Elizabeth A. Kowal